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Attorneys for Plaintiffs FRIAS HOLDING  
9 COMPANY and MARK A. JAMES

10 UNITED STATES DISTRICT COURT

11 DISTRICT OF NEVADA

12 FRIAS HOLDING COMPANY, a Nevada  
corporation; and MARK A. JAMES, an  
13 individual,

14 Plaintiffs,

15 vs.

16 GREENBERG TRAURIG, LLP, a Nevada  
limited liability partnership; GREENBERG  
17 TRAURIG, P.A., a Florida professional  
association; SCOTT D. BERTZYK, an  
18 individual; DOES I through X; and ROE  
ENTITIES XI through XX, inclusive,  
19

Defendants.  
20

Case No. 2:11-CV-00160-GMN (LRL)

**STIPULATION AND ORDER TO  
EXTEND TIME TO FILE  
PLAINTIFFS' RESPONSE TO  
DEFENDANTS' MOTION TO DISMISS  
PURSUANT TO FRCP 12(b)(6)**

**(First Request)**

21 PURSUANT TO LR 6-1, LR 6-2, and LR 7-1, IT IS HEREBY STIPULATED AND  
22 AGREED by and among counsel for Plaintiffs Frias Holding Company and Mark A. James  
23 (jointly, "Plaintiffs"), the law firm of Bailey❖Kennedy, and counsel for Defendants Greenberg  
24 Traurig, LLP, Greenberg Traurig, P.A., and Scott D. Bertzyk (collectively, "Defendants"), the  
25 law firms of Steptoe & Johnson LLP and Brownstein Hyatt Farber Schreck, LLP, that the time

1 for Plaintiffs to file their response to Defendants' Motion to Dismiss Pursuant to FRCP  
2 12(b)(6) (Doc. No. 9), filed February 7, 2011 (the "Motion to Dismiss"), shall be extended for a  
3 period of two (2) business days to accommodate Plaintiffs' counsel's schedule. Plaintiffs shall  
4 have up to and including February 28, 2011 to serve and file their Response to Defendants'  
5 Motion to Dismiss.

6 DATED this 23<sup>rd</sup> day of February, 2011

DATED this 23<sup>rd</sup> day of February, 2011.

7 BAILEY❖KENNEDY

BROWNSTEIN HYATT FARBER  
SCHRECK, LLP

9 By: /s/ Dennis L. Kennedy

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Attorneys for Defendants GREENBERG  
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P.A., and SCOTT D. BERTZYK

21 **IT IS SO ORDERED** this 1st day of March, 2011.

23  
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25  
  
Gloria M. Navarro  
United States District Judge